

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**ASSENTED-TO MOTION TO ENLARGE TIME FOR
FILING MOTIONS TO SUPPRESS EVIDENCE**

Defendant, Dzhokhar Tsarnaev, by and through counsel, with the assent of the government, hereby moves this Court to enlarge the time for filing motions to suppress evidence.

The motions to suppress evidence raise complex issues, which the parties are discussing in an attempt to narrow the issues to be addressed by the Court. In addition, there were at least 35 search warrants executed in connection with this case, including federal and state search warrants.¹

The parties have agreed to, and request the Court to allow, an enlargement of time to file motions to suppress statements to and including April 23, 2014, and motions to suppress evidence seized during searches to and including May 7, 2014.

Dated: April 8, 2014

Respectfully Submitted,
DZHOKHAR TSARNAEV
By his attorneys

/s/ Judy Clarke

¹ Government counsel is planning to provide copies of additional search warrants to defense counsel this week.

Judy Clarke, Esq. (CA Bar # 76071)
CLARKE & RICE, APC
1010 Second Avenue, Suite 1800
San Diego, CA 92101
(619) 308-8484
JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq. (SC Bar # 967)
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 458-8188
BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM_FICK@FD.ORG

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 8, 2014.

/s/ Judy Clarke